

**SURREBUTTAL TESTIMONY OF VIVIAN BROWN DOWDY**

**FOR**

**THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2000-0210-W/S**

**IN RE: UNITED UTILITY COMPANIES, INC.**

**Q. HAVE YOU PREVIOUSLY FILED TESTIMONY ON BEHALF OF THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA IN THIS  
PROCEEDING?**

**A.** Yes. I previously filed testimony concerning the Staff's audit report in this proceeding.

**Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

**A.** The purpose of my surrebuttal testimony is to respond to three of the issues raised in the rebuttal testimony of witness Steven M. Lubertozi on behalf of United Utility Companies, Inc. in this proceeding.

**Q. WHAT IS MR. LUBERTOZZI'S POSITION WITH REGARD TO THE  
STAFF'S ADJUSTMENT TO OPERATOR'S SALARIES?**

**A.** Mr. Lubertozi indicates that he disagrees with the Staff's adjustment because Staff's adjustment includes one less employee than was contained in the Company's test year. Mr. Lubertozi states that an operator has been replaced and that a copy of the Company's payroll register with the new employee has been given to the Staff.

1 **Q. HOW DID STAFF ARRIVE AT ITS ADJUSTMENT FOR OPERATOR'S**  
2 **SALARIES IN THIS CURRENT CASE?**

3 A. During Staff's audit the Operator's Salaries were annualized using the December 26,  
4 2000 payroll. Staff made an inquiry of the Company to determine whether any of the  
5 employees on the December 26, 2000 payroll register had been terminated or retired.  
6 At the time of the audit we learned an employee had been terminated; therefore Staff  
7 did not include that position in the calculation of the annualization of Operator  
8 Salaries. Staff was not provided and has not examined any payroll register or any  
9 other Company document that supports the hiring of a new employee.

10 **Q. WHAT IS MR. LUBERTOZZI'S POSITION WITH REGARD TO THE**  
11 **STAFF'S ADJUSTMENT FOR DEPRECIATION EXPENSE AND PLANT**  
12 **ADDITIONS?**

13 A. Mr. Lubertozzi states that the Staff's adjustment only includes a portion, namely  
14 \$24,389, of the cost to complete the installation of the portable generators. He states  
15 that the portable generators are currently in service and should be considered a  
16 known and measurable change.

17 **Q. HOW DID STAFF ARRIVE AT ITS ADJUSTMENT FOR DEPRECIATION**  
18 **EXPENSE AND PLANT ADDITIONS?**

19 A. During Staff's audit the Company was asked to provide necessary documentation to  
20 verify the Company's adjustment to include additional plant. Staff verified \$24,389  
21 from the Company's ledgers as of December 31, 2001. Staff's adjustments to Plant-

1 in-Service and Depreciation Expense were based on that amount. Staff was not  
2 afforded documentation of the amount Mr. Lubertoizzi has claimed.

3 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A.** Yes, it does.  
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